III. Remarks

Claims 1, 3 and 4 remain pending in the present application as amended.

Claim 1 has been amended to incorporate features previously set forth in dependent claim 2 and to more particularly point out that feature of applicant's invention in which the control means causes the driving of two DC brushless motors to be stopped when the sum of the numbers of rotations of the two motors reaches a predetermined value. Support for this feature is found in the specification, for example in paragraphs 0023, 0024 and 0025. Claim 2 has been cancelled. Claims 3 and 4 have been amended to reflect a change in dependency from cancelled claim 2 to claim 1.

The Examiner objected to the drawings stating that each box in the different figures must be textually labeled. The undersigned appreciates the courtesy of a telephone discussion with the Examiner on Wednesday, October 27, 2004 about this objection to the drawings. The Examiner stated that this objection was made in error and will be withdrawn.

The Examiner rejected claims 1, 2 and 4 under 35 USC §102(b) as being anticipated by US Patent No. 4,776,528 (West). According to the Examiner, West teaches a control apparatus for a plurality of DC motors 28/32 comprising hall effect devices 38/44 for detecting the position of the motors, drive means 42/46 for controlling the current through the motors, and a control means 40 for detecting the number of rotations of the motors 32/28 and controlling the operation of the motor based on said input. Regarding claim 2, the Examiner stated that West describes that a strip of tape 14 is secured between the two motors and that one of the motors is used to feed out the strip and the other one is used to wind up the strip. With respect to claim 4, the Examiner stated that West describes that said motors include motor shafts 30 and 36.

As stated above, amended claim 1 includes that feature of applicant's invention in which the control means causes the driving of two DC brushless motors to be stopped when the sum of the numbers of rotations of the two motors reaches a predetermined value. The West patent

discloses the use of two motors 28 and 32 to wind a tape. The motors of West are stopped when a position sensor is actuated (see, for example, column 3, lines 43-54). The West patent neither discloses nor suggests that feature of applicant's invention in which the control means causes the driving of two DC brushless motors to be stopped when the sum of the numbers of rotations of the two motors reaches a predetermined value. Consequently, it is respectfully submitted that claim 1, as amended, is patentable over West. Since claim 4 depends from claim 1, it is respectfully submitted that claim 4 is likewise patentable over West for the reasons stated above with respect to claim 1. Furthermore, cancellation of claim 2 has rendered the rejection thereof moot.

The Examiner rejected claim 3 under 35 USC §103(a) as being unpatentable over West and US Patent No. 5,717,424 (Simson et al). According to the Examiner, the only difference between the teachings of West and the subject matter of claim 3 is that claim 3 recites that the strip secured around the motor shaft comprises posters of same length. The Examiner stated that Simson et al teaches a web system for controlling motors 12 and 13 for feeding out and winding up a plurality of pliable banners 1/2/3. The Examiner concluded that it would have been obvious to one of ordinary skill in the art to use a motor control system as taught by West to wind and un-wind a strip of posters connected between two motors since West describes that his invention can be used in any type of reel to reel web transport apparatus.

As set forth above, amended claim 1 includes that feature of applicant's invention in which the control means causes the driving of two DC brushless motors to be stopped when the sum of the numbers of rotations of the two motors reaches a predetermined value. As previously stated, this feature is neither disclosed nor suggested by West. Simson et al discloses winding up a chart 5 by means of two motors 12 and 13. When the passage of a mark disposed on each chart frame is detected by an optical chart position sensor 15, the chart is stopped (see, for example, column 5, lines 40-47 and column 10, lines 46-53). Simson et al, when considered individually or in combination with West, neither discloses nor suggests that feature set forth in amended claim 1 wherein two DC brushless motors are stopped when the sum of the numbers of rotation

reaches a predetermined value. Since claim 3 depends from amended claim 1, it is respectfully submitted that claim 3 is likewise patentable over the West and Simson et al references.

The Examiner considered that the prior art made of record and not relied upon to be pertinent to applicant's disclosure. The Examiner stated that the documents cited in PTO-892 describe other web systems using DC motors and position sensors such as hall effect devices. It is respectfully submitted that none of these references, when considered either individually or in combination with each other or in combination with West and/or Simson, et al, disclose nor suggest applicant's invention as set forth in the claims of the present application as amended.

In view of the above, it is respectfully submitted that claims 1, 3 and 4, all of the claims presently pending in the application are patentable over the references of record. Therefore, reconsideration of the present application and an early Notice of Allowance is earnestly solicited.

Date: October 27, 2004

Respectfully submitted,
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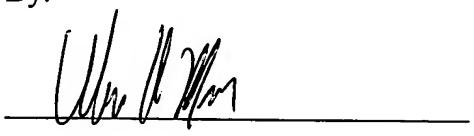
By:



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